TABLE OF CITED CASES

[References are to pages in Volume 42.]

A

Abingdon v. Schempp, 374 U.S. 203 (1963) . . 161
American Bemberg Corp. v. Comm'r, 10 T.C. 361 (1948), aff'd per curiam, 177 F.2d 200 (6th Cir. 1949) 720, 721
Arundel-Brooks Concrete Corporation; Comm'r v. 129 F.2d 762 (4th Cir. 1942) 611
Asiatic Petroleum v. Comm'r, 31 B.T.A. 1152 (1935), aff'd, 79 F.2d 236 (2d Cir., 1935), cert. denied, 296 U.S. 645 (1935) 205

B

Barrett v. Comm'r, 58 T.C. 284 (1972) . . . 48, 49, 54
Barnett v. Commissioner, T.C. 609 (1978) . . . 49
Batok v. Commissioner, T.C.M. ¶ 92,727 (1992) 52
Beck v. Commissioner, 85 T.C. 557, 569 (1985) 233
Boe v. Commissioner, 307 F.2d 339 (9th Cir. 1962) 282
Brock v. Commissioner, T.C. Memo 1989-641 233

C

C.I.R. v. Groetzinger, 107 S. Ct. . . 47, 51, 54
Carter Foundation Production Company v. Campbell, 322 F.2d 827 (5th Cir. 1963) . . . 609, 694, 697
Charles Ilfeld Co. v. Hernandez, 292 U.S. 62, 68 [13 AFTR 881] (1934) 251
Charles T. Froh v. Comm'r, 100 T.C. No. 1 (1992) 522
Charles Wire Inc. v. United States, 209 F.2d 878 (7th Cir. 1962) 694
Citizens and Southern Capital, 900 F.2d 266 (11th Cir. 1990) 280
Colombo v. Commissioner, T.C. Memo 1975-162 602
Comm'r v. Arundel-Brooks Concrete Corporation, 152 F.2d 225 (4th Cir. 1945) . . . 610, 612
Commissioner v. Danielson, 378 F.2d 771, (CA 3) 277
Comm'r v. First Security Bank of Utah, N. A., et al., 63 TC 644 (1967), aff'd, 436 F.2d 1192 (10th Cir., 1971), aff'd, 405 U.S. 394, 92 S. Ct. 1085 (1972) 208
Commissioner v. Killian, 314 F.2d 852 (5th Cir. 1963) 282
Comm'r v. Revere Land Company, 48-1 U.S.T.C. ¶ 9313 (3rd Cir.) 604
Coors Porcelain Co. v. Comm'r, 52 T.C. 682 (1969), aff'd on other issues, 429 F.2d 1 (10th Cir. 1970) 717
Curry v. United States, 296 F.2d 630 (5th Cir. 1968) 689

D

Deputy v. Du Pont, 308 U.S. 488, 60 S. Ct. 363 (1940) 48, 716
Detroit Edison Company v. Comm'r, 43-1 U.S.T.C. ¶ 9418 (S. Ct.) . . . 604, 606, 607, 610, 612, 613
Diamond Brothers Company v. Comm'r, 322 F.2d 725 (3rd Cir. 1963) 689, 690
Dillin v. United States, 433 F.2d 1097 (5th Cir. 1970) 688
Donrey v. U.S., 809 F.2d 534 (8th Cir. 1987) 280

E

Edwards v. Cuba R.R. Company, 1 U.S.T.C. ¶ 139 (S. Ct. 1921) . . . 604, 611, 612, 613
Engel v. Vitale, 370 U.S. 421 (1962) . . . 161
Estate of H. Floyd Sherrod v. Comm'r, 774 F.2d 1057 (11th Cir. 1985), rev'g 82 T.C. 523 (1984) 505
Estate of Holl, Deceased, Bank IV Wichita, N.A., Executor v. Comm'r, 101 T.C. 29 (1993) . . 731, 732, 734, 737, 738, 740, 741
Estate of Mixon, Jr. v. United States, 464 F.2d 394 (5th Cir. 1972) 689, 692
Evwalt Devlopment Corporation v. Comm'r 63, 056 P-H Memo T.C. (1963) 692

F

Farley Realty Corporation v. Comm'r, 279 F.2d 701 (2nd Cir. 1960) 688
Federated Department Stores v. Commissioner, 426 F.2d 417 (6th Cir. 1970) 606
Fin Hay Realty Co. v. United States, 398 F.2d 694 (3d Cir. 1968) 691, 693
Flint v. Stone Tracy Co., 220 U.S. 107 . . . 47
Flowers v. Commissioner, 80 T.C. 914, 941 (1983) 234

[References are to pages in Volume 42.]

Frank Lyon Co. v. U.S., 41 AFTR2d 78-1142 233
Furman III v. U.S., 54 AFTR2d 84-6191 (1984) 54

G

G.U.R. Company v. Comm'r, 41 B.T.A. 223 (1940), aff'd, 117 F.2d 187 (7th Cir., 1941) 206
Georgia-Pacific Corporation v. Comm'r, 63 T.C. 790 (1975) 693, 704
Gilbert v. Comm'r, 262 F.2d 512 (2nd Cir. 1959) 693
Glensder Textile Company v. Comm'r, 46 B.T.A. 176 (1942) 33
Gooding Amusement Co. v. Comm'r, 236 F.2d 159 (6th Cir. 1956) 687, 704
Granite Construction, Inc. v. United States, 962 F.2d 998 243
Grosswald v. Schweiker, 653 F.2d 58 (2d Cir. 1981) 50

H

Hall v. Comm'r, 32 TC 390 (1959) 205
Harlan v. United States, 409 F.2d 904 (5th Cir. 1969) 701
Heitzman v. Comm'r, 88-2 U.S.T.C. ¶ 9565, 859 F.2d 783 (9th Cir. 1988) 706
Heitzman v. Comm'r, T.C. Memo, 1987-109, aff'd, 859 F.2d 783 (8th Cir. 1988) . . . 226
Helvering v. Horst, 311 U.S. 112 47
Henderson v. United States, 374 F.2d 36 (5th Cir. 1967) 690
Higgins v. Commissioner, 61 S. Ct. 475, 478 (1941) 49
Hotel KingKede v. Comm'r, 180 F.2d 310 (10th Cir. 1950) 716
Hotel Sulgrave v. Comm'r, 21 T.C. 619 (1954) 723
Hornaday v. Commissioner, 81 T.C. 830 (1983) 50

I

INDOPCO, Inc. v. Comm'r, 112 S. Ct. 1039 (1992) 720
Illinois Merchants Trust Co. v. Comm'r, 4 B.T.A. 103 (1926) 717

J

J.H. Miles & Co. v. United States, 3 Cl. Ct. 10, 13, (1983) 250
John Kelly Co. v. Comm'r, 326 U.S. 521 (1946) 686, 701
John V. Rowan v. United States, 219 F.2d 51, 55 (5th Cir. 1955) 687, 694, 695, 697
John Wanamaker Philadelphia v. Comm'r, 139 F.2d 644 (3rd Cir. 1943) 692
Johnston v. U.S., 586 F. Supp. (D.C. Tex. 1985), rev'd and remanded, 779 F.2d 1123, 1129 (5th Cir. 1986) 732, 734, 737
Jones v. Comm'r, 242 F.2d 616 (5th Cir. 1957) 723, 724

K

Kaonis v. Comm'r, 37 TCM 792 (1978), aff'd, 639 F.2d 788 (9th Cir. 1981) 725, 726
Keller Street Development Co. v. Comm'r, 37 TC 559 (1961), aff'd in part on other grounds, 323 F.2d 166 (9th Cir. 1963) 725
Kraft Foods Company v. Comm'r, 232 F.2d 118 (2nd Cir. 1956) 688, 694

L

L.E. Shunk Latex, Inc. v. Comm'r, 18 TC 940 (1952) 208

M

Maass v. Higgins, 41 BTA 1178, aff'd, 114 F.2d 1017 (2nd Cir. 1940), rev'd on other grounds, 312 U.S. 443 (1941) 738
Marye v. Parsons, 114 U.S. 325 (1885) . . 686
Massey Motors, Inc. v. United States, 364 U.S. 92 (1960) 719
Midland Empire Packing Co. v. Comm'r, 14 TC 635 (1950) 717, 720
Miller Estate v. Comm'r, 239 F.2d 729 (9th Cir. 1956) 690
Missouri Pacific Corp. v. United States, 5 Cl. Ct. 296, 302 [54 AFTR 2d 84-5157] (1984) . . . 251
Mobley v. United States, 8 Cl. Ct. 767 [56 AFTR 2d 85-5909] (1985) 252
Morrissey v. Commissioner, 296 U.S. 344 (1935) 31, 412
Moss v. Comm'r, 831 F.2d 833 (9th Cir. 1987), rev'g 51 TCM 742 (1986) 724, 726
Mountain Fuel Supply Co. v. United States, 449 F.2d 816 (10th Cir. 1971) 724
Mullin Building Corporation v. Comm'r, 167 F.2d 1001 (3d Cir. 1948) 692
Murray v. Curlett, 374 U.S. 203 (1963) . . 161

[References are to pages in Volume 42.]

N

National Starch and Chemical Corp. v. Comm'r, 918 F.2d 426 (3rd Cir.), aff'd, 93 TC 67 . . 720
Neely v. Comm'r, 85 TC 934, 947 (1985) . . . 711
Nelson v. Comm'r, 19 TC 575 (1952) . . . 694
Newark Morning Ledger v. United States, 734 F.Supp. 176 (DNJ 1990) . . . 281, 283, 286
Nickeson v. Commissioner, 69 AFTR 2d 92-1161 (10th Cir. 1992) 233
Nickeson v. Comm'r, 92-1 USTC ¶ 50,233, 962 F.2d 973, 976 (10th Cir. 1992) 710

O

O. H. Kruse Grain & Milling v. Comm'r, 279 F.2d 123 (9th Cir. 1960) 689, 692
Oberman Manufacturing Co. v. Comm'r, 47 TC 471 (1967) 720
Otey v. Comm'r, 70 TC 312 (1978) 14

P

Perrault v. Comm'r, 25 TC 439 (1955) . . 702
Plainfield Union Water Co. v. Comm'r, 47 TC 333 (1962) 720, 721
Proctor & Gamble v. Comm'r, 95 TC 23 (1990) 204
Proctor Shop, Inc. v. Comm'r, 82 F.2d 792 (9th Cir. 1936) 692, 702

Q

Quaker State Oil Refining Corp. v. U.S., 994 F.2d 824 (1993) 237, 243

R

RKO Theatres Inc. v. United States, 163 F. Supp. 598 (Ct. Cl. 1958) 723
Rose v. Commissioner, 88 TC 386, 412–13 (1987) 233
Roy H. and Mary L. Osterhout, et al v. Comm'r, 1993 RIA TC Memo ¶ 93,250 . . 226, 705, 712

S

Sabine Royalty Corporation v. Comm'r, 17 TC 1071 (1951) 694, 699
Salyersville National Bank v. U.S., 610 F.Supp. 938 (D Ky 1977), rev'd, 613 F.2d 650 (6th Cir, 1980) 208
Segel v. Comm'r, 89 TC 817 (1987) 684
1661 Corporation v. Tomlinson, 377 F.2d 291 (5th Cir. 1967) 690, 694
Snyder v. Commissioner, 295 U.S. 134 . . . 47
Snyder Brothers Co. v. Comm'r, 367 F.2d 980 (5th Cir. 1966) 688, 692
Stark v. Commissioner, 86 T.C. 243, 250-51 (1986) 733
Steffen v. Commissioner, 81 T.C.M. 2478 (1981) 49, 50, 51
Stoeltzing v. Comm'r, 266 F.2d 374 (3rd Cir. 1959) 723
Sun Properties, Inc. v. United States 220 F.2d 171 (5th Cir. 1955) 702

T

Taft v. Comm'r, 314 F.2d (9th Cir. 1963) . . . 690, 691
Talbott Mills Co. v. Comm'r, 326 U.S. 521 (1946) 686, 701
Teitelbaum v. Comm'r, 294 F.2d 541 (7th Cir. 1962), cert. denied, 368 U.S. 987 (1965) . . 723
Thor Power Tool Co. v. Comm'r, 439 U.S. 522 (1979) 727
Tyler v. Tomlinson, 414 F.2d 844 (5th Cir. 1969) 686, 689

U

U.S. v. Chicago, Burlington & Quincy R. Co., 412 U.S. 401 (1973) . . 606, 608, 609, 610, 612
United States v. Ptasynsi, 462 U.S. 74 (1983) 646
United States v. Ron Pair Enterprises, Inc., 489 U.S. 235, 242 [63 AFTR2d 89-652] (1989) 250

W

Wehrli v. United States, 400 F.2d 686 (10th Cir. 1968) 719, 723
Welch v. Helvering, 290 U.S. 111 (1933) 206, 716
Wilshire & Western Sandwiches v. Comm'r, 175 F.2d 718 (9th Cir. 1949) 691
Witco Chemical Corp. v. U.S., 84-2 USTC 9751, 742 F.2d 615 (1984) 237
Wolfsen Land and Cattle Co. v. Comm'r, 72 TC 1 (1979) 718, 720, 722
Woolrich Wollen Mills v. United States, 289 F.2d 444 (3rd Cir. 1961) 720, 722

[References are to pages in Volume 42.]

Y

Young and Rubicam, Inc., v. United States, 410 F.2d 1233, 1234 (Ct. Cl. 1969) 205

Your Host v. Comm'r, 58 TC 10, 23-24 (1972) 206

TABLE OF CITED ADMINISTRATIVE RULINGS

[References are to pages in Volume 42.]

LETTER RULINGS

TAM 8314011 . . . . . 253, 259
TAM 9010027 . . . . . 33, 417, 423
TAM 9107028 423
TAM 9226035 . . . . . 418, 422
TAM 9240004 . . . . . 718, 719, 729
TAM 9242025 33
TAM 9308001, 93-4 I.R.B. 2 600
TAM 9313009 422
TAM 9315004 . . . . . 718, 719, 722, 729
TAM 9321047 419
TAM 9325048 422
TAM 9404021 674

REVENUE PROCEDURES

89-20, 1989-1 C.B. 841 521
89-21, 1989-1 C.B. 842 521
90-30, 1990-1 C.B. 534 521
90-31, 1990-1 C.B. 539 521
90-32, 1990-1 C.B. 546 521
93-7, 1993-1 I.R.B. 170 674

REVENUE RULINGS

54-584, 1954-2 C.B. 345 48
57-10,1957-1 C.B. 314 481
68-470, 1968-2 C.B. 1205 608
82-45, 1982-1 C.B. 89 209
82-210, 1982-2 C.B. 204 50
83-46, 1983-1 C.B. 16 645
83-129, 1983-2 C.B. 105 37
88-76, 1988-2 C.B. 392 31
93-16, 1993-8 I.R.B. 5 609
93-44,1993-34 I.R.B. 14 674
93-92, 1993-42 I.R.B. 11 674
93-93, 1993-42 I.R.B. 13 674
94-5, 1994-2 I.R.B. 21 674
94-6, 1994-3 I.R.B. 11 674

AUTHOR INDEX

[References are to pages in Volume 42.]

A

Adam, Peter S.
Joint Ventures in Russian Oil Production 451

B

Baker, C. Richard
Accounting Implications of Long-Term Contracts for the Purchase of Cogenerated Power by Regulated Electric Utilities . . . 101

Barnes, Cornelius W.
An Inquiry Into Strategic and Operating Goal Relationships in Oil and Gas Exploration . . . 303

Basi, Bart A.
Amortization of Intangible Assets Separate From Goodwill . . . 273

Bell, William
The Texas Limited Liability Company . . . 29

Billing, B. Anthony
A Theoretical Framework for Evaluating Judicial Decision-Making . . . 347

Blankley, Alan I.
Relative Historical Tax Burdens for Oil and Gas Industries: 1978-1992 . . . 769

Byington, J. Ralph
Auditor Concentration in the Gas Industry: A Longitudinal Study . . . 129

C

Carter, C.P.
The Impact on the Oil and Gas Industry of Changes in Accounting for Postretirement Benefits . . . 577

Chung, Kwang-Hyun
Postretirement Benefits in the Financial Statements: An Analysis and Comparison . . 785

Coker, Dianna Ross
Regulations Address Sales Disguised as Contributions to Partnerships . . . 13

Coker, Dianna Ross—Cont.
Independent Producer Status for Windfall Profits Tax Undermined by Trademark Requirements . . . 237

Crain, John L.
Update on the Status of Noncorporate Entities in the Oil and Gas Industry . . . 261

Crane, Mike
Amortization of Intangible Assets Separate From Goodwill . . . 273

Crumbley, D. Larry
Snapshot of the Budget Reconciliation Act of 1993 . . . 287
A Theoretical Framework for Evaluating Judicial Decision-Making . . . 347

D

Dudley, Lola Woodard
Convertible Bond Financing and Common Stock Equivalence in the Oil and Gas Industry, 1970-1986 . . . 89

Duffy-Deno, Kevin T.
Oil Industry Incentive Programs: The Fiscal Effects of Utah's Petroleum Industry Recovery Act . . . 473

E

Erickson, Paul R.
Limited Liability with Material Participation: Avoiding Passive Loss Status for "Nonworking" Oil or Gas Investments . . . 39

F

Fambrough, Judon
Negotiating an Oil and Gas Lease . . . 381
When an Oil and Gas Lease Terminates . . 615

Fay, Jack R.
A State-of-the-Art Potpourri Report of Business Taxes (Other than Income Taxes) in Over 100 Countries From A to Z (Antigua to Zimbabwe) . . . 427

Friske, Karyn
Operating as a Limited Liability Company in the Oil and Gas Industry . . . 411

[References are to pages in Volume 42.]

G

Gately, Mary Sue
As an Alternative Investment for Your Assets, the Charitable Remainder Trust Allows You to Give and Receive . . . 517

H

Hailey, William A.
An Inquiry Into Strategic and Operating Goal Relationships in Oil and Gas Exploration . . . 303

Hale, Mechelle
As an Alternative Investment for Your Assets, the Charitable Remainder Trust Allows You to Give and Receive . . . 517

Hickox, Chet
Tax Consequences and Planning Opportunities for Retired Executives in the Oil and Gas Industry . . . 45

Higgins, Mark
Tax Consequences and Planning Opportunities for Retired Executives in the Oil and Gas Industry . . . 45

Horst, William
Development of a LIFO Index with the Use of Statistical Analysis . . . 565

Hosch, Chester J.
Nonshareholder Contributions of Capital: The Case for Excluding from Gross Income the Oil Industry's Image Program Payments for Gasoline Retailers . . . 599

Howe, Heidi
Debt and Equity Issues in the Oil and Gas Industry: When Is a Corporation Thinly Capitalized? . . . 681

Hume, Evelyn C.
Newly Proposed Regulations for Gas Producers: Significant Changes in Accounting Methods . . . 183

J

Jeffords, Raymond
Activity Based Costing in the Oil and Gas Industry . . . 547

K

Kelliher, Charles F.
Tax Court Disallows Minimum Annual Royalty Deductions in the Computation of Abandonment Loss . . . 705

Kemp, Robert S.
Pension Asset Allocation Under Recent Tax Reform: Tax Arbitrage Revisited . . . 57

Kerr, David S.
Ethics: The Key to a Prosperous Oil and Gas Industry . . . 143

Klein, Y.L.
No Abatement in the Petroleum Refining Sector: Management Strategies for Regulatory Compliance . . . 121

Koutrodimos, Demetrios
The Texas Limited Liability Company . . . 29

Kratchman, Stanley H.
Ethics: The Key to a Prosperous Oil and Gas Industry . . . 143

L

Lawrence, Janice E.
Relative Historical Tax Burdens for Oil and Gas Industries: 1978-1992 . . . 769

Lenz, Don
Gas Balancing Arrangements — Their Impact and Scope Under the Proposed Regulations 627

Licata, Michael P.
Tax Court Disallows Minimum Annual Royalty Deductions in the Computation of Abandonment Loss . . . 705

Loudder, Martha L.
Financing Constraints and Investment in the Oil and Gas Industry: 1976-1990 . . . 639

Lynch, Howell
Deductible Preferred Dividends? The Case of Offshore Limited Liability Company MIPS . . . 671

M

Maloney, David M.
Pension Asset Allocation Under Recent Tax Reform: Tax Arbitrage Revisited . . . 57

[References are to pages in Volume 42.]

Mankal, Jagannath S.
The Supreme Court and the Hills-Alternative Minimum Tax: Mountain or Molehill . . 247

Manzon, Jr., Gil B.
Effective Tax Rates in the Oil and Gas Industry: An Empirical Analysis of the Effects of ERTA and TRA 86 . . . 1

Mark, Richard S.
Gas Balancing Arrangements — Their Impact and Scope Under the Proposed Regulations 627

Marshall, Brooks
Pension Asset Allocation Under Recent Tax Reform: Tax Arbitrage Revisited . . . 57

Matoney, Jr., Joseph P.
Tax Consequences and Planning Opportunities for Retired Executives in the Oil and Gas Industry . . . 45

McClenny, R. Lorraine
Regulations Address Sales Disguised as Contribution to Partnerships . . . 13

Moore, Charles K.
The Texas Limited Liability Company . . . 29

Munter, Paul
Auditor Concentration in the Gas Industry: A Longitudinal Study . . . 129

O

Oxner, Tom
Computer Usage by Internal Auditors in the Oil and Gas Industry . . . 531

P

Pandit, Ganesh Mangesh
Auditor Concentration in the Gas Industry: A Longitudinal Study . . . 129

Posey, Clyde L.
The Supreme Court and the Hills Alternative Minimum Tax: Mountain or Molehill . . 247
Debt and Equity Issues in the Oil and Gas Industry: When Is a Corporation Thinly Capitalized? . . . 681

R

Rivers, Richard
Computer Usage by Internal Auditors in the Oil and Gas Industry . . . 531

Robison, Jack
Gas Balancing Arrangements — Their Impact and Scope Under the Proposed Regulations 627

Ryan, Charles
Newly Proposed Regulations for Gas Producers: Significant Changes in Accounting Methods . . . 183

Ryan, Jr., Edward J.
An Inquiry Into Strategic and Operating Goal Relationships in Oil and Gas Exploration . . . 303

S

Scofield, Stephen B.
Debt and Equity Issues in the Oil and Gas Industry: When Is a Corporation Thinly Capitalized? . . . 681

Segal, Mark A.
Environmental Cleanup Expenditures: An Inquiry Into Their Proper Tax Treatment . . . 715

Seida, Jim A.
Promotion of Nontax Motives Is Vital to Show Profit Motive: An Examination of Section 183 and the Osterhout Decision . . . 221

Sharp, Andrew D.
Deferred Turbulence: The Potential Impact of the Up-and-Coming Jet Fuel Tax Increase . . 465

Sharp, Tricia
Deferred Turbulence: The Potential Impact of the Up-and-Coming Jet Fuel Tax Increase . . 465

Smith, L. Murphy
Ethics: The Key to a Prosperous Oil and Gas Industry . . . 143
A Theoretical Framework for Evaluating Judicial Decision-Making . . . 347

Smith, W. Robert
Effective Tax Rates in the Oil and Gas Industry: An Empirical Analysis of the Effects of ERTA and TRA 86 . . . 1

Spear, Nasser A.
An Analysis of Differences Between Independent Oil and Gas Companies Using Successful Efforts and Full Cost Methods: 1985-1989 . . . 743

Strawser, Joyce A.
Postretirement Benefits in the Financial Statements: An Analysis and Comparison . . 785

[References are to pages in Volume 42.]

T

Teall, Howard D.
Information Content of Canadian Oil and Gas Companies' Cash Flow Disclosures . . . 325

Thibadoux, Greg M.
Activity Based Costing in the Oil and Gas Industry . . . 547

Tillinger, Janet W.
Financing Constraints and Investment in Oil and Gas Industry: 1976-1990 . . . 639

Tunnell, Larry
Operating as a Limited Liability Company in the Oil and Gas Industry . . . 411

V

Verreault, Kathryn M.
The Impact on the Oil and Gas Industry of Changes in Accounting for Postretirement Benefits . . . 577

W

Wacker, Raymond
Proposed I.R.C. Section 482 Regulations of Foreign Legal Restrictions: The I.R.S. Attempts to Overturn *Proctor & Gamble* . . . 203
The In-Place Value of Oil and Gas Reserves Extracted During the Alternative Valuation Period of I.R.C. 2032(a)(1) . . . 731

Wadhwa, Darshan L.
Development of a LIFO Index with the Use of Statistical Analysis . . . 565

Williamson, James E.
Timber Taxation . . . 501

Woodruff, Charles K.
An Inquiry Into Strategic and Operating Goal Relationships in Oil and Gas Exploration . . . 303

Wood, Jill L.
Newly Proposed Regulations for Gas Producers: Significant Changes in Accounting Methods . . . 183

Wood, Jill L.
Newly Proposed Regulations for Gas Producers: Significant Changes in Accounting Methods . . . 183

Y

Young, Ron
Deductible Preferred Dividends? The Case of Offshore Limited Liability Company MIPS . . . 671

Z

Zimmerman, Raymond A.
Operating as a Limited Liability Company in the Oil and Gas Industry . . . 411

SUBJECT INDEX

[References are to pages in Volume 42.]

A

Abandonment Loss
Computation . . . 711

Activity Based Management (ABM)
Concept explained . . . 547
Purpose . . . 548

Activity Based Costing
Application to Oil & Gas Industry . . . 550
Explained . . . 550
Techniques . . . 556

Activity Flowcharting
(See Activity Based Costing)

Activity Not Engaged in for Profit
Defined . . . 222
Treatment of expenses . . . 225

Adjusted Basis
Defined . . . 248

Airline Industry
Financial condition . . . 466

Alternative Minimum Tax (ATM)
Implications of Hill Case . . . 249
Provisions in BRA of 1993 . . . 287

Annual Gas Balancing Method
Accounting method explained . . . 192

Ansoff's Entrepreneurial Model
Introduction to . . . 304

Auditor Concentration
Changes in audit environmental . . . 134
Large firm monopoly . . . 131

B

Budget Reconciliation Act of 1993
Business related changes . . . 292
Compensation . . . 293
Enterprise zones . . . 298
Individual provisions . . . 287
Woodlands ownership . . . 503

C

Canadian Oil and Gas Companies
Information content . . . 325

Capital Structure
In oil and gas industry . . . 695
Thin . . . 682

Cellular Manufacturing
Explained . . . 549

Charitable Remainder Trust (CRT)
Defined . . . 518
Disadvantages . . . 528
Tax consequences . . . 522
Types . . . 518

Cogenerated Power
Defined . . . 101
Non-utility generations . . . 101, 103

Common Stock Equivalence of Bonds
Ability of the test . . . 89
Evaluation of CSE test . . . 93
Failures of the CSE test . . . 94

Computers
Access techniques . . . 537
End user computing . . . 544
Software usage . . . 540
Use by internal auditors . . . 531, 533

Continuous Flow Manufacturing (CFM)
Explained . . . 549

Contracts
Long-term . . . 101
Spot . . . 112
Take-or-pay . . . 112

Controlled Taxpayer
Defined . . . 206

Convertible Bond
Effective yields . . . 92
Financing . . . 89
History . . . 90

Corporate and Business Strategies
Defined . . . 303

Cost Allocation
Residual method . . . 275, 277

Cumulative Gas Balancing Method
Accounting method explained . . . 186

[References are to pages in Volume 42.]

D

Deficit Reduction Act of 1984
Deferment and avoidance of tax . . . 13
Disguised sales provision . . . 14

Disguised Sales Provision
Exempted transactions . . . 19
Final regulation . . . 16
Gain recognition . . . 26
Identification of . . . 16
Intention of Congress . . . 14
Presumptions . . . 17

Double Deduction
Tangible costs . . . 251

E

Economic Recovery Tax Act of 1981 (ERTA)
Effects of . . . 1
Tax burden . . . 2

Effective Tax Rates (ETRs)
Examination of . . . 1

Emerging Issues Task Force (EITF)
Approach to remedial action . . . 727

End User Computing
(See Computers)

Environmental Cleanup Expenditure
Tax treatment . . . 715

Ethics
Education . . . 146
Payoffs of . . . 151
Role of . . . 145

F

Flexible Manufacturing Systems (FMS)
Explained . . . 549, 550

Foreign Business Taxes
Countrywise information . . . 430

Foreign Legal Restrictions
Cross border payments . . . 203
Defined . . . 213
Fundamental issue . . . 206
Judicial treatment . . . 208

Full Cost Method
Economic characteristics . . . 744

G

Gas Balancing Agreement (GBA)
Annual Gas Balancing Method . . . 628, 631
Cumulative Gas Balancing Method . . 627, 634
Defined . . . 184

Group Technology
(See Cellular Manufacturing)

H

Herfindahl Index
Of auditor concentration . . . 136

I

Image Program Payments
Explained . . . 600

Independent Producer Status
Denial of . . . 238

In-Place Value of Oil and Gas Reserve
Determination of . . . 732
Methods of . . . 734

Intangible Assets/Property
Amortization deductions . . . 284
Amortization problems . . . 273
Defined . . . 297
Goodwill . . . 274
Straight-line amortization . . . 296
Tax treatment . . . 273, 278

Internal Auditors
Computer usage . . . 531

International Transfer-Pricing Rules
I.R.C. Section 482 . . . 205

Investment Tax Credit
Eligible Property . . . 770

J

Jet Fuel Tax
Increase and its impact . . . 467

Joint Operating Agreement (JOA)
Defined . . . 184

Joint Ventures in Russia
Compared with production sharing agreements . . . 463
Tax implications . . . 451

Judicial Decision-Making
Framework . . . 347

[References are to pages in Volume 42.]

Judicial Decision-Making—Cont.
Research models . . . 351, 352

Just-In-Time (JIT)
Explained . . . 548

L

Last-In, First-Out (LIFO) Index
Explained . . . 566
Methods . . . 566

Limited Liability Company
Elements of . . . 31, 415
Formation of or conversion to . . . 420
General background . . . 30
Objectives . . . 30
Offshore LLC's . . . 671
Texas LLC . . . 29
Texas LLC statute . . . 30

Long-term Purchased Power Contracts
Accounting and financial disclosure . . . 102
Accounting implications . . . 101, 102
Capacity payments . . . 106
Characteristics . . . 104
Energy payments . . . 107
Qualified facility status . . . 108
Risks . . . 102

M

Marketable Permits of Pollution
Purchase and sale of . . . 121

Market Segment Specialization Program
For gas retailers . . . 599

Master Limited Partnership
Advantages . . . 264
Corporations for tax purposes . . . 265
Drop-down and roll-out . . . 264

Material Participation
Standards . . . 505

Minimum Annual Royalty (MAR)
(See Royalty)

Monthly Income Preferred Shares (MIPS)
Issue by an LCC . . . 672

N

NO_x Abatement
Emission standards . . . 121
Management strategies . . . 121, 122

NO_x Abatement—Cont.
Strategies in petroleum refining sector . . . 123
No_x emissions . . . 125

Nonqualified Stock Option (NSO)
Deduction . . . 293

Non-Utility Generation
Background . . . 103

O

Oil and Gas Lease
Duration . . . 385
Force majeure . . . 389
General Provisions . . . 391
Granting clause . . . 383
Pooling . . . 395
Royalty . . . 390

Oil and Gas Lease Termination
Exceptions for delay rentals . . . 617
Phases . . . 616

Omnibus Budget Reconciliation Act of 1993 (OBRA)
(See Budget Reconciliation Act of 1993)

P

Partnerships
Limited partnership legislation . . . 41, 42
Limited partnership problem . . . 262
Master limited partnership . . . 264
Passive losses . . . 39, 40
Tax free status . . . 13

Pension Asset Allocation
Allocation strategies . . . 62

Pooled Income Fund
Alternative to CRT . . . 529

Postretirement Benefits
SFAS 81 . . . 787
SFAS 106 . . . 577, 580, 581, 786
Impact on oil and gas industry . . 577, 580, 581

Primary Earnings Per Share (PEPS)
Computation of . . . 89

Q

Qualified Business
Defined . . . 298
Enterprise zones . . . 298

[References are to pages in Volume 42.]

R

Revenue Reconciliation Act of 1990
Tax arbitrage . . . 57
Reintroduction of capital gains . . . 275

Risk Reduction Factors
Issue of . . . 733

Royalty
In oil and gas leases . . . 390
Minimum annual royalty . . . 705
Shut-in royalties . . . 620

Royalty Trusts
Defined . . . 267
Tax advantages . . . 267, 268

S

Selective Catalytic Reduction (SCR)
No_x abatement strategies . . . 122

Strategic Management
Ansoff's Entrepreneurial Model . . . 304
Corporate and business strategies . . . 303
Strategic and operating goals . . . 306, 309, 310

Subchapter K
Anti-abuse rules . . . 191
Exclusion . . . 183

Successful Efforts Method
Economic characteristics . . . 744

T

Tangible Costs
Double deduction . . . 251

Tax Arbitrage
Corporate and personal . . . 59, 62, 63
Incentive for . . . 57
Strategies . . . 67

Tax Reduction Act of 1975
Elimination of percentage depletion . . . 644

Tax Reform Act of 1986
Effects of . . . 1
Tax arbitrage . . . 57
Tax shelter industry . . . 39
Woodland ownership . . . 503

Timber Taxation
Tax treatment of woodland . . . 501

Total Quality Management (TQM)
Explained . . . 548

U

Utah's Petroleum Industry Recovery Act
Incentives . . . 474

W

Wealth Replacement Trust
Defined . . . 529

Windfall Profits Tax
Explained 237, 238

Wisconsin Forest Crop Law Program
Tax features . . . 508

Woodland Investment
Economic advantages . . . 506
Types of . . . 507

Workover Tax Credit
Defined . . . 474, 475
State revenue impact . . . 475